

REMARKS

The present application suggests determining when to coalesce non-sequential writes. The only thing that Mandal ever suggests is coalescing sequential writes.


For example, in the cited material at paragraph 6, the discussion refers to "coalescing small sequential RAID writes." Similarly, in paragraph 32, the discussion is concerning "small write coalescing for sequential RAID writes." Likewise, in paragraph 71, the discussion refers to "small sequential writes and coalescing them into larger writes."

Thus, all that the reference teaches is coalescing sequential writes which is simpler than what is claimed. The claimed invention coalesces non-sequential writes.

Therefore, the application as currently situated should patentably distinguish over the cited reference.

Respectfully submitted,

Date: May 4, 2006



Timothy N. Trop, Reg. No. 28,994
TROP, PRUNER & HU, P.C.
8554 Katy Freeway, Ste. 100
Houston, TX 77024
713/468-8880 [Phone]
713/468-8883 [Fax]

Attorneys for Intel Corporation